

DECLARATION OF ROBERTO J. DUQUE

I, ROBERTO J. DUQUE, declare under the penalty of perjury:

1. I am over 18 years of age, and I have personal knowledge of the facts and circumstances stated in this declaration.

2. That From August 2022, to October 2, 2024, I served as Vice President of Business Development with Ignite International, LTD (Ignite US), and I am deeply familiar with the business of, Ignite International Brands, LTD. (Ignite Canada), and Ignite US (collectively referred to as “Ignite”), as well as business relationships among Ignite US, Ignite Canada, and the individual defendants Paul Bilzerian, Scott Rohledder, and Rupy Dhadwar.

3. Ignite Canada is a Canadian corporation with an office in Texas. Ignite Canada is in the business of selling electronic cigarettes (vapes), spirits (alcohol), apparel, and other brand products.

4. Ignite Canada – depending on the line of products – conducts its business either directly, or through its fully-owned subsidiaries such as Ignite US.

5. In the American market, Ignite US is responsible for sales of both tobacco-derived nicotine products and synthetic nicotine products popularly known as electronic cigarettes or vapes.

6. In the State of Nevada, Ignite US sells its nicotine products through an extensive network of Terrible Herbst convenient stores that in Las Vegas only, currently number 124 locations.

December 30, 2024 printout from Ignite's own website located at <ignite.com>.

1 <https://puffignite.co/pages/store-locator-1>> showing more than a hundred stores selling Ignite
2 US's nicotine products in Las Vegas and vicinity.
3

4 8. In the American market, Ignite Canada is responsible for sales of alcohol
5 products such as vodka and tequila.
6

7 9. Attached as Exhibit B to this declaration is a true and correct copy of the
8 December 30, 2024 printout from Ignite's own website located at <
9 <https://ignitespirits.co/pages/store-locator>> showing more than sixty stores selling Ignite
10 Canada's alcohol products in Las Vegas and vicinity.
11

12 10. To sell its products in Nevada, both Ignite US and Ignite Canada utilize its
13 distributor Summit Spirits and Wine, Inc. ("Summit Spirits") – a Nevada Corporation located
14 in Las Vegas, Nevada.
15

16 11. That during my entire tenure with Ignite US, both Ignite US, and Ignite Canada
17 extensively marketed their products in the United States in general and Nevada specifically,
18 through use of Dan Bilzerian's likeness, such as his pictures, videos, signatures, voice, and
19 overall brand of Dan Bilzerian.
20

21 12. Ignite's distributor Summit Spirits also utilizes Dan Bilzerian's likeness to sell
22 Ignite's products in Nevada. Attached as Exhibit C to this declaration is a December 20, 2024
23 printout from Summit Spirit's website located at <<https://sswbeverage.com/ignite-spirits/>> ,
24 marketing Ignite's vodka with Dan Bilzerian's name.

25 13. That many of the pictures and videos used by Ignite in its marketing campaigns
26 were taken in Las Vegas, Nevada, where Dan Bilzerian lives.
27

28 14. That due to Dan Bilzerian's recognizable brand as a world-famous poker player,
29 Ignite's extensively utilized his likeness to sell its products specifically in Nevada obtaining a
30 significant revenue amount derived of sales of alcohol and nicotine.
31

15. That during my tenure at Ignite US, all significant business decisions at Ignite were made by Paul Bilzerian, Scott Rohledder, Michalis Voulelis, and Rupy Dhadwar, known together as the Leadership Team.

16. That Paul Bilzerian, despite not having any formal position with Ignite, is the ultimate decision-maker at Ignite and controls all aspects of its business, such as marketing, sales, finance, distribution, etc.

17. That during his tenure as CEO of Ignite, Scott Rohleder executed the Leadership Team decisions, including Ignite's marketing campaigns and use of Dan Bilzerian's likeness.

18. I declare under penalty under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 2, 2025, in Highland Village, Texas.

Roberto J. Duque
Roberto J. Duque
Digitally signed by Roberto J. Duque
Date: 2025.01.02 14:50:06 -06'00'

Exhibit A

WARNING: This product contains nicotine. Nicotine is an addictive chemical.

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0 Login

#No2Minors

STORE LOCATOR

 Type a postcode or address...**Travel Centers of America****0331**

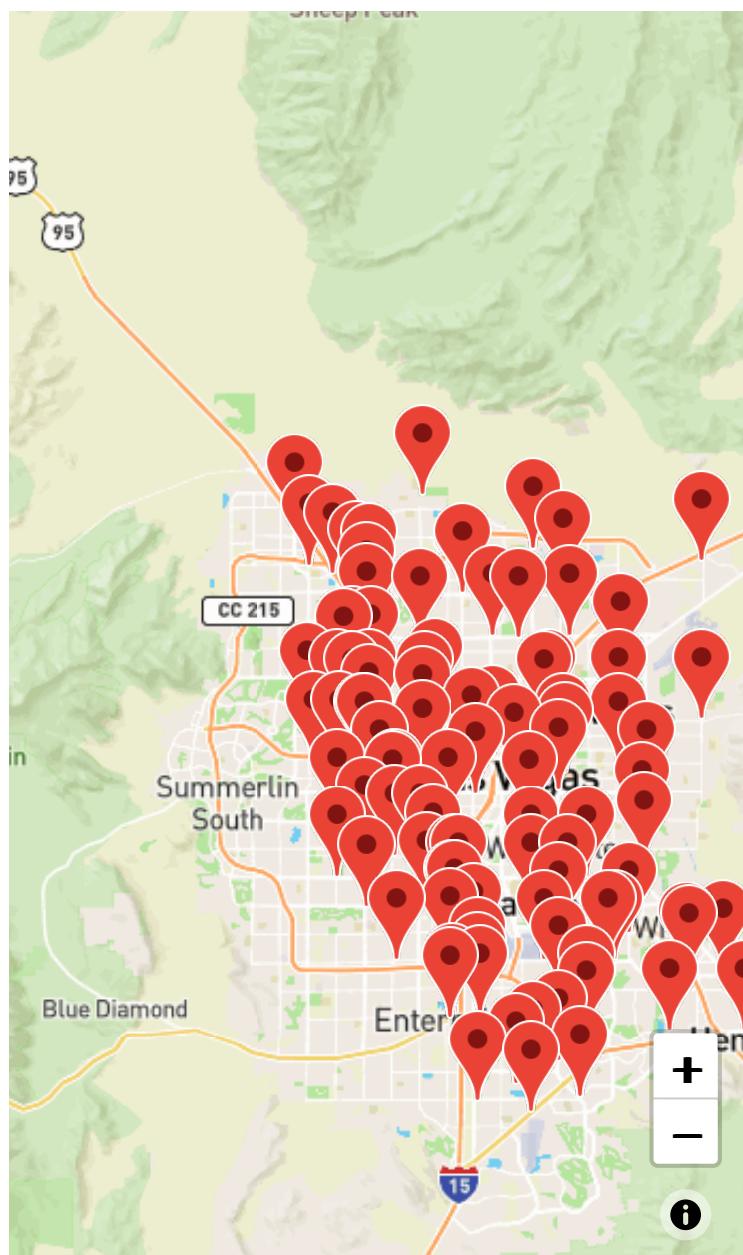
6595 North Hollywood Blvd
I-15, Exit 54 (Speedway Blvd.)
Las Vegas, NV 89115
United States

702-632-2640**Terrible Herbst**

6680 E. LAKE MEAD BLVD
LAS VEGAS, NV 89115
702-453-7680

**Terrible Herbst**

3616 N LAS VEGAS BLVD
LAS VEGAS, NV 89115

(702) 642-1027

When you need that unmistakable experience that only comes from IGNITE vapes, you need it **now**. But no worries if you've run out and live near one of the hundreds of stores across the country that carries this premium product.

VAPE SHOP NEAR ME

When looking for a vape shop near you that can provide you with the must-have IGNITE vape, use our online store locator. Find the quality, premium vape experience without the wait of delivery.

ORDER ONLINE FOR SELECTION AND CONVENIENCE

It's awesome to have a vape shop right down the street. But what if you don't have one conveniently located? Or what if they don't have your favorite flavor? Order online.

What if life is so f*cking busy that even a quick run to the store is out of the question? Have it shipped straight to you.

Favorites are great, whether it's a flavor or your perfect puff count. But what about new arrivals? Your **new** favorite may be online only. Order and have it conveniently delivered to your door.

THINGS TO KNOW WHEN BUYING VAPES FROM GAS STATIONS

If you run out of your favorite IGNITE vape, vape shops and gas stations can be great for easy, fast access. But they're sharing shelf space with (ahem) other vape brands. So you may face limited IGNITE flavor and puff count selections. And as nice as they may be, the workers at a gas station are probably not exactly knowledgeable sources for vaping devices.

Find a vape shop near you featuring IGNITE vapes or order online. But no matter where you buy your IGNITE products, don't compromise. Never settle. IGNITE your life.



IGNITE INTERNATIONAL BRANDS LTD. VAPE

CUSTOMER SERVICE



3308 Towerwood Drive
Farmers' Branch, TX 75234-2317
United States

675 Cochrane Drive, East Tower, Suite 639
Markham, Ontario L3R 0B8
Canada

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WARNING: Electronic Cigarettes and E-liquid products may contain nicotine, a chemical known to the State of California to cause birth defects or other reproductive harm. These products are not smoking cessation products and have not been tested as such. E-liquid products, electronic delivery devices, and accessories are intended for use by adults of legal smoking age (e.g., 21 years or older), and not by children, women who are pregnant or breastfeeding, or persons with or at risk of heart disease, high blood pressure, diabetes or taking medicine for depression or asthma, or who otherwise may be sensitive to nicotine. Nicotine is addictive and habit forming, and it is very toxic by inhalation, in contact with the skin, or if swallowed. Ingestion of the non-vaporized concentrated e-liquid ingredients can be poisonous. Keep away from children and pets. If ingested, immediately consult your doctor or vet. Nicotine can increase your heart rate and blood pressure and cause dizziness, nausea, and stomach pain. Inhalation of this product may aggravate existing respiratory conditions. These e-liquid products have not been evaluated by the Food and Drug Administration nor are they intended to treat, mitigate, prevent or cure any disease or condition.



Exhibit B


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[STORE LOCATOR](#)
[SHOP TEQUILA](#)
[SHOP VODKA](#)


STORE LOCATOR

FIND IGNITE SPIRITS AT YOUR LOCAL RETAILER.



Lee's-N. Rancho

4421 N. Rancho
Las Vegas

Lee's-N. Rancho

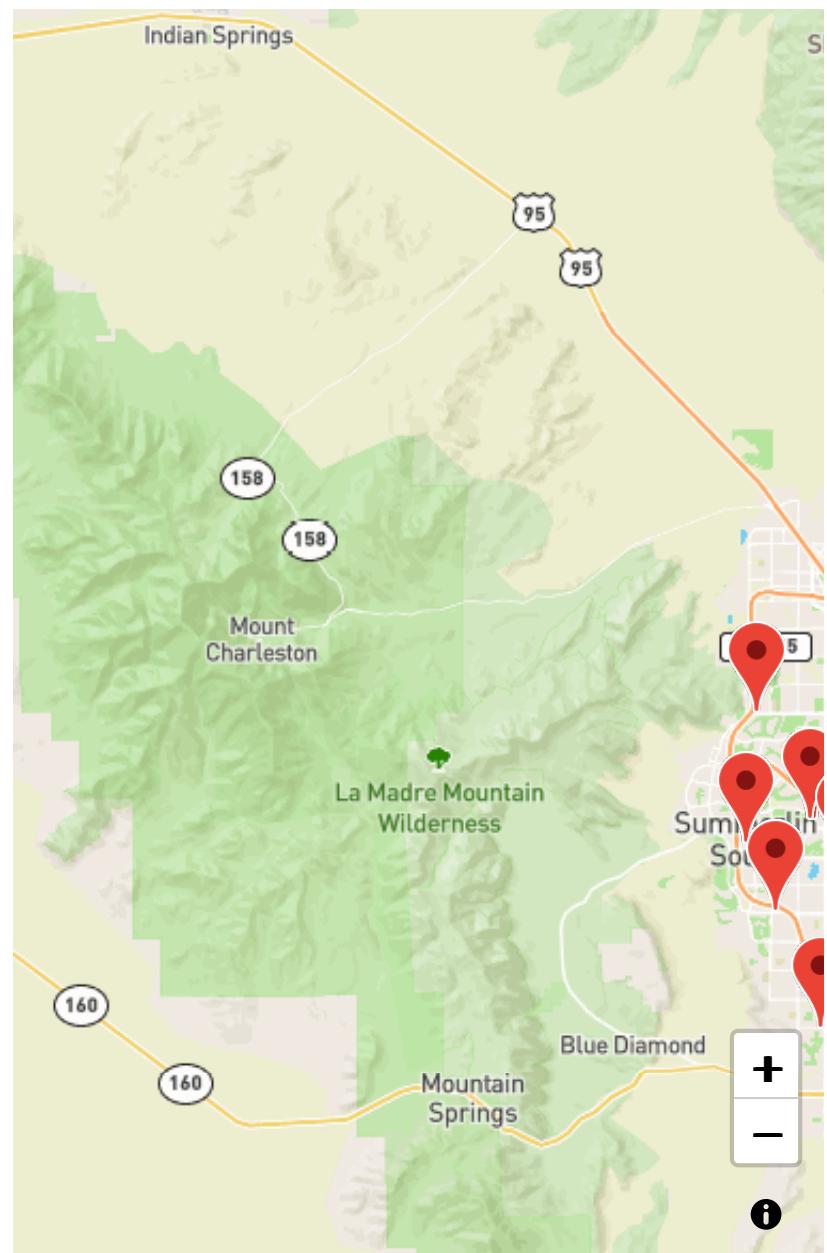
4421 N. Rancho
Las Vegas

Lee's-Aliante

2830 W Deer Springs
Rd.
Las Vegas

Lee's-Aliante

2830 W Deer Springs
Rd.
Las Vegas





**IGNITE
INTERNATIONAL
BRANDS LTD.**

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Drive
Farmers' Branch,
TX 75234-2317
United States

675 Cochrane
Drive, East Tower,
Suite 639
Markham, Ontario
L3R 0B8
Canada

support@ignite.co

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Must be 21 to enjoy. Please drink responsibly.

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Exhibit C



HOME

OUR BRANDS



“IT’S A LIFESTYLE.”
– DAN BILZERIAN